

STOLL KEENON OGDEN PLLC
500 West Jefferson Street, Suite 2000
Louisville, Kentucky 40202
Telephone: (502) 333-6000
Facsimile: (502) 333-6099
Lea Pauley Goff (*pro hac vice*)
Emily L. Pagorski (*pro hac vice*)

*Counsel for Creditor,
Tempur Sealy International, Inc. and its affiliates*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|---|---|-------------------------------|
| ----- | X | |
| In re | : | Case No. 18-23538-RDD |
| | : | |
| SEARS HOLDING CORPORATION, et al., | : | Chapter 11 |
| | : | |
| Debtors.¹ | : | (Jointly Administered) |
| ----- | X | |

**MOTION FOR WITHDRAWAL OF LEA PAULEY GOFF
AS ATTORNEY OF RECORD**

Lea Pauley Goff, Esq. (“Counsel”), hereby moves (the “Motion”) the Court, pursuant to Rule 2090-1(e) of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brand Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

for the Southern District of New York, to enter an order permitting Counsel to withdraw as counsel of record for Tempur Sealy International, Inc. and its affiliates, Sealy Mattress Manufacturing Co., LLC, Tempur-Pedic North America, LLC, Sealy Mattress Company of Puerto Rico, and Comfort Revolution, LLC (collectively “Tempur”) and in support thereto represents as follows:

1. Pursuant to a separately memorialized settlement agreement between the Debtors and Tempur, there are no longer any issues pending in these bankruptcy cases concerning Tempur.

2. Tempur has consented to Counsel’s withdrawal of her appearance in these bankruptcy cases. Tempur has also been served with a copy of this Motion.

WHEREFORE, it is respectfully requested that the Court authorize the withdrawal of Counsel from the above-captioned Cases and instruct the Clerk of the Court to remove Counsel from any applicable notice and service lists. A proposed order is attached hereto as Exhibit A.

Date: June 14, 2022

Respectfully submitted,

/s/ Lea Pauley Goff

Lea Pauley Goff

(*pro hac vice*)

Stoll Keenon Ogden PLLC

500 West Jefferson Street

Suite 2000

Louisville, Kentucky 40202

(502) 333-6000

lea.goff@skofirm.com

Counsel for Creditor,
Tempur Sealy International, Inc. and its
affiliates

CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2022, a copy of the foregoing was filed electronically and that a true and accurate copy of the foregoing was served on the all parties served by the Court's CM/ECF noticing system.

/s/ Lea Pauley Goff
Counsel for Creditor,
Tempur Sealy International, Inc. and its
affiliates

8792231.1